

# NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

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January 27, 2012

## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: Docket No. CC-00-257  
Keywest Communications (USA) Inc.

Dear Sir/Madam:

By this letter, Nowalsky, Bronston & Gothard, APLLC ("NBG") hereby provides notice on behalf of Key West Global Telecommunications Berhad ("Keywest"), Keywest Communications (USA) Inc. ("KCUSA") and Sifa Technology Limited ("SIFA") pursuant to Section 64.1120(e) of the Commissions Rules of the pending transfer of Sale Shares from Keywest to SIFA. The parties propose a transaction whereby SIFA will acquire all of the Sale Shares of Keywest from the Shareholders resulting in SIFA owning certain subsidiaries of Keywest, including KCUSA. The transaction will only involve a change of the ultimate control of KCUSA, and will not involve transfer of operating authority nor any transfer of customers. In accordance with the requirements of Section 64.1120(e), NBG submits the following information on behalf of the parties:

1. Name of parties to transaction:

Transferring Carrier: Key West Global Telecommunications Berhad ("Keywest")

Acquiring Carrier: Sifa Technology Limited ("SIFA")

Keywest and SIFA are not affiliates as defined by Section 3(1) of the Communications Act, as Amended. 47 U.S.C. § 153(1).

2. Types of telecommunications services to be affected:

Interstate, international and intrastate interexchange and local services.

3. Date of Transfer:

Approximately February 29, 2012

4. Certificate of compliance:

Attached hereto as Exhibit A is KWUSA 's certification of compliance with the requirement to provide advance subscriber notice in accordance with §64.1120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to this streamlined process.

5. Copy of notice sent to affected subscribers:

Attached hereto as Exhibit B is the notice sent by KCUSA to affected customers.

An additional copy has been enclosed to be date-stamped and returned in the envelope provided as evidence of the filing.

Should you have any questions, please contact the undersigned.

Respectfully submitted,



Leon Nowalsky, Esq. /*ln*  
Counsel for Key West

Telecommunications Berhad, Keywest  
Communications (USA) Inc. and  
Sifa Technology Limited  
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lnowalsky@nbglaw.com

## Exhibit A

Keywest Communications (USA) Inc.  
5811 Cooney Road, Suite 11400  
Richmond, British Columbia V6X 3M1 Canada

### CERTIFICATION

Keywest Communications (USA) Inc. certifies that it has complied with all requirements of 47 C.F.R. 64.1120(a) including providing the advance subscriber notice in accordance with 47 C.F.R. 64.1120(e)3, with the obligations specified in that notice, and with other statutory and Commission requirements that apply to the streamlined process for acquisition of the subscriber base of another telecommunications carrier.

Keywest Communications (USA) Inc.

By: 

Date: 1-3-2012

## Exhibit B

## Customer Notice/Bill Insert

Dear Customer:

Key West Global Telecommunications Berhad ("Keywest"), including certain of its subsidiaries, has signed a definitive agreement to be acquired by Sifa Technology Limited ("SIFA"). Keywest is the ultimate parent company of the telecommunications provider Keywest Communications (USA), Inc. ("KCUSA"). The transaction will result in a change in the ultimate ownership of KCUSA. This transaction requires certain regulatory approvals in order to be complete. The companies expect the transaction to be completed by February 29, 2012.

The change in the ownership of KCUSA will not affect or disrupt your current service in any way. You can expect the same outstanding level of service and customer care as well as additional resources that will be leveraged to ensure that you receive the highest levels of customer support. In addition your rates and the terms and conditions of your existing service will remain the same.

You will not incur any carrier-change charges from your local telephone company as a result of this transaction. If KCUSA is your long distance provider and such a charge appears on the bill from your local telephone company, please call the customer service department at (604) 278-2778, and a representative will reimburse you or credit your account accordingly. SIFA will be responsible for any outstanding KCUSA inquiries or complaints following the date the transfer becomes effective.

You have a choice of telecommunications service providers and have the right to choose another provider for your services. If you decide to switch to a different provider and you have **not** informed KCUSA by the date of the transfer, your service will continue with and will be serviced by SIFA.

SIFA welcomes you and appreciates the opportunity to be your telecom provider. The combined SIFA and KCUSA teams look forward to continuing to provide your business with world-class customer service and the most reliable, cutting-edge business-grade telecommunication services available today.

If you have any questions, please contact a KCUSA customer service representative at (604) 278-2778.

Sincerely,

Kwai Fong Yip  
President  
Keywest Communications (USA) Inc.

Xiao Ping Yang  
President  
Sifa Technology Limited